

The Honorable Barbara Jacobs Rothstein

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

NIKITA TARVER,

Plaintiff,

vs.

WASHINGTON STATE, AND NICK
KING,

Defendants.

NO. 2:22-cv-00736

STIPULATED JUDGMENT¹

Judgment Summary (RCW 4.64.030):

Judgment Creditor(s): Nikita Tarver

Judgment Creditor(s)' Attorney(s): Jesse Valdez; James Bible

Judgment Debtor: Washington State Patrol

Judgment Amount: \$825,000.00

Pre-Judgment Interest: \$0

Post-Judgment Interest: \$0

Taxable Costs and Attorney Fees: \$0

¹ In light of this judgment, all other pending motions are STRICKEN as MOOT.

THIS MATTER having come on regularly before the undersigned judge of the above-entitled Court; and the Plaintiff, Nikita Tarver, acting by and through Jesse Valdez and James Bible, and the Defendant, State of Washington, Washington State Patrol², acting by and through Nicholas W. Brown, Attorney General, and Brendan Lenihan, Assistant Attorney General; and these parties having made a stipulation pursuant to RCW 4.92.150, without any admissions of liability or fault, settling and compromising this action against the Washington State Patrol, and it appearing to the Court, after a review of the files and records herein and statements of counsel in open court, that the sum of EIGHT HUNDRED AND TWENTY-FIVE THOUSAND DOLLARS and 00/100 cents (\$825,000.00) is a proper and just settlement to be paid by the Washington State Patrol to the Plaintiff; and the Court being fully advised, now, therefore,

IT IS HEREBY ORDERED That the Plaintiff Nikita Tarver shall have judgment against the Defendant State of Washington, Washington State Patrol for the total sum of EIGHT HUNDRED AND TWENTY-FIVE THOUSAND DOLLARS and 00/100 cents (\$825,000.00). Reasonable fees and costs found by the court shall be deducted from these gross amounts. Additionally, any liens, subrogated interests, or outstanding medical bills of which Plaintiffs' counsel has actual or constructive notice prior to court approval of this settlement shall be resolved out of these gross amounts, and defendants shall have no liability for any such liens, interest, or bills.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED That neither party shall recover against any other party their respective fees, costs, nor interest herein.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED That, pursuant to the provisions of RCW 4.92.160, the Defendant, State of Washington, Washington State Patrol shall pay to the clerk of the above-entitled Court the sum of EIGHT HUNDRED AND TWENTY-FIVE

² Former defendant Nick King was previously dismissed with prejudice from this lawsuit. Nick King is not a party to this stipulated judgment, which is entered only against the Washington State Patrol.

1 THOUSAND DOLLARS and 00/100 cents (\$825,000.00) for the benefit of the Plaintiff herein and
2 that upon receipt of said sum the clerk thereof shall forthwith record this judgment as satisfied
3 against the State of Washington, Washington State Patrol and shall hold such sum subject to the
4 further order of this Court.

5 DONE this 28th day of May 2025.
6
7

8 

9 THE HON. BARBARA JACOBS
10 ROTHSTEIN

11 Presented by:

Approved as to Form and
Notice of Presentation Waived:

12 NICHOLAS W. BROWN
13 Attorney General

VALDEZ LEHMAN, PLLC /
JAMES BIBLE LAW GROUP

14
15 /s/Brendan Lenihan
16 BRENDAN LENIHAN, WSBA No. 56066
17 Assistant Attorney General
Attorney for the Washington State Patrol

S/James Bible

JAMES BIBLE, WSBA No. 33985
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of May 2025, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

James Bible, WSBA No. 33985
Jesse Valdez, WSBA No. 35378
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DATED this 22nd day of May 2025.

NICHOLAS W. BROWN
Attorney General

/s/Brendan Lenihan
BRENDAN LENIHAN, WSBA #56066
Assistant Attorney General
Attorney for Defendant Washington State Patrol